

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

KIMBERLY BELTRAN,
Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

v.

SOS LIMITED, YANDAI WANG,
and ERIC H. YAN,

Defendants.

Civil Action No. 1:21-cv-7454-RBK-
EAP

(Document Filed Electronically)

CLASS ACTION

Motion Day: November 29, 2022

**NOTICE OF MOTION AND MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that pursuant to the Court’s Order Granting Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (ECF No. 47), as modified by ECF Text Order on July 26, 2022 (ECF No. 48), on November 29, 2022 at 3:00 p.m., Lead Plaintiffs William Rodgers and Shawn Ho (“Plaintiffs”)¹ will move this Court, the Honorable Robert B. Kugler, United States District Judge of the United States District Court for the District of New Jersey, 4th & Cooper Streets, Courtroom 4D, Camden, New Jersey, for entry of an order granting final approval of the proposed class action Settlement, approving the Plan of Allocation for distribution of the Net Settlement Fund, and certifying the Settlement Class for settlement purposes.

In support of this motion, Plaintiffs rely on the accompanying Memorandum of Law, the Joint Declaration of Laurence Rosen and Reed R. Kathrein and exhibits attached thereto, all filed contemporaneously herewith, the pleadings and records on file in this Action, and such further argument and briefing as may be presented at or before the Settlement Hearing. In the event that there are requests for exclusions or objections received after the date of this filing,² Plaintiffs will file an updated proposed final order and judgement with their reply.

¹ Unless otherwise defined, all capitalized terms used herein have the meanings ascribed to them in the Stipulation of Settlement dated May 20, 2022 (the “Stipulation”) (ECF No. 43).

² The deadline for objections and exclusions is November 8, 2022.

Dated: November 1, 2022

Respectfully submitted,

/s/ Laurence M. Rosen

Laurence M. Rosen

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CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2022, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Laurence M. Rosen

Laurence M. Rosen